

EXHIBIT A

Nathaniel H. Robin, M.D.

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF ILLINOIS

3
4 CIVIL ACTION NO. 17-CV-793-MJR-SCW

5
6 IN RE: DEPAKOTE CASES

7 A.S. by MARTHEE SANSONE, ET AL.,
8 Plaintiff,

9 vs.

10 ABBOTT LABORATORIES, INC.,
11 Defendant.

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13
14
15 DEPOSITION

16 OF

17 NATHANIEL H. ROBIN, M.D.

18 December 8, 2017

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23 REPORTED BY: Heather Spier

24 Certified Court Reporter,
25 and Notary Public

1 there are a lot of -- I'm referring to his
2 answer I guess. You know, I breezed
3 through them. My -- my role in the case
4 is fairly focused, so I kind of look for
5 things that are relevant to the question
6 I'm being asked.

7 Q. I think previously you
8 testified that you view yourself as having
9 a narrowly focused area of expertise that
10 you I think you referred to as a tiny
11 island?

12 A. Perhaps I did.

13 Q. That sounds accurate?

14 A. Yes.

15 Q. In order to ascertain what
16 would be relevant in all those records
17 that were attached to Ms. Sansone's
18 deposition, how did you do that?

19 A. Well, the question before me
20 is to determine if -- to determine if the
21 child's problems are due to exposure,
22 prenatal exposure, to valproic acid. So
23 the things I look for are things that
24 relate to understanding the autism
25 spectrum of the problems and then whether

1 or not the woman was taking -- the mother,
2 Ms. Sansone, was taking valproic acid, and
3 anything relevant to family history.

4 So often medical records --
5 these kind of medical records contain lots
6 and lots of information about regular
7 office visits and such. And, you know, I
8 just skim over those.

9 Q. Did you -- when you say you
10 skimmed over some records --

11 A. I mean, I skim over them all.

12 Q. Okay. Perhaps that last
13 answer is what I was looking for. You
14 did, in fact, look at all pages of the
15 records?

16 A. Yes.

17 Q. But you -- if you saw
18 something -- if you saw that it didn't
19 appear to have anything germane to those
20 points you just went through, you didn't
21 linger on that particular page and just
22 kept going?

23 A. Correct. Or if -- correct.

24 Q. Right. And if you did see
25 something that was germane either to

1 relates to when this report was prepared.

2 Q. I understand. But at least in
3 terms of what you put in your report --

4 A. Yes, you're correct.

5 Q. So the photographs are not
6 shown as a basis of your opinions?

7 A. Correct.

8 Q. Now, you talk about clinical
9 genetics in Paragraph 1.2, and you refer
10 to diagnostic services that are provided
11 by clinical geneticists, right?

12 A. Yes.

13 Q. What are the tools that
14 clinical geneticists use to provide their
15 diagnostic services?

16 A. History, family history,
17 clinical exam, laboratory testing. And I
18 guess I should include review of records.

19 Q. Now, you said history, family
20 history. Is there a distinction there?

21 A. Yes. History is that
22 individual's medical history. Family
23 history is the family history.

24 Q. All right. The history,
25 medical history, could be either as